

# **EXHIBIT J**

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1 Q. Were they maintained as far as you know,  
2 like in a bigger file. Did they go in  
3 individual's files?  
4 A. I don't believe I moved them to individual  
5 files. I just kept them all together in a folder,  
6 labeled archives time sheets.  
7 Q. Do you know whether -- this is going to be  
8 weird language. But do you know whether they were  
9 archived -- not like in the sense of archives.  
10 But like archived within The City at all?  
11 A. No, they weren't.  
12 Q. Okay. Do you remember them just being  
13 disposed of, anything like that?  
14 A. I did not dispose of them prior to my  
15 departure. So they would have been floating --  
16 they would have been in my office. I didn't move  
17 or pack up files before I left, because they were  
18 not specific.  
19 You know, each time sheet had all of the  
20 employees listed in order to file them. We would  
21 have had to create a copy for each person's file.  
22 And I just never got around to it. So I just kept  
23 them all in that folder.  
24 Q. Do you remember seeing anything about Nick

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1 Barone's attendance that sits out to you?  
2 A. No.  
3 Q. You mentioned that this was made because  
4 of sort of the arrival times and there were some  
5 mix-ups at archives. Is that a fair summary?  
6 A. Generally speaking, there were just  
7 operational concerns with archives. So there were  
8 like -- that was the larger issue that we were  
9 trying to address.  
10 There were issues with the flow of  
11 physical files from archives to City Hall, and  
12 from City Hall, back to archives. That whole  
13 process was in question and needed to be reviewed  
14 and revamped or refined.  
15 So as a part of that, when there were  
16 complaints, or concerns arose regarding the timing  
17 for file delivery and stuff, that's how that came  
18 up. The wait a minute. They are not even there.  
19 Or you know, like so that was a part of the larger  
20 issue.  
21 Q. The operational concerns, were any of  
22 those specifically related to Nick Barone?  
23 A. No.  
24 Q. Do you remember whether he had any issues

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1 with bringing files to City Hall or taking them  
2 from City Hall?  
3 A. Honestly, of the four or five employees on  
4 the team, Nick was probably the most consistent of  
5 that group. So there weren't concerns specific to  
6 him.  
7 Q. We talked earlier about the asking people  
8 for contributions to Ms. Gordon's campaign and  
9 that sort of stuff. Do you remember us talking  
10 about that?  
11 A. Yes.  
12 Q. Do you remember any discussion about  
13 Nick's participation or lack of participation in  
14 that?  
15 A. Yes. Vaguely.  
16 Q. What do you remember about that?  
17 A. That he didn't contribute.  
18 Q. Who told you that?  
19 A. I don't remember.  
20 Q. Do you remember who it was discussed with  
21 and in what context it was discussed?  
22 A. No. I don't want to speculate. I just  
23 know that -- I don't want to speculate. I don't  
24 remember.

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1 Q. Let me see if I can ask you some  
2 questions. Was Nick's name brought up in the  
3 broader conversation about who didn't contribute?  
4 A. Not to me directly. Indirectly, I know  
5 that I heard mention of him being one of the  
6 people that didn't contribute as well as another  
7 employee in archives and, you know, a few other  
8 people.  
9 So it was indirect. It was a small  
10 office. So there was always a ton of  
11 conversation. So indirectly, I did hear mention  
12 of it. I didn't know whether or not it was true.  
13 Q. And you don't remember who you heard  
14 mention of it from?  
15 A. No.  
16 Q. Do you remember where you heard mention of  
17 it?  
18 A. No.  
19 Q. Were you in the office?  
20 A. Yes.  
21 Q. And was that around November, December of  
22 2021?  
23 A. I don't remember. I don't remember.  
24 Q. So Nick was fired January 7th, 2022. And